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-and-

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*Attorneys to G4S USA, G4S Secure Solutions (USA), Inc.
and G4S Secure Integration LLC*

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Bankruptcy Case
No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

Re: Docket Nos. 7037 and 7253

**NOTICE OF WITHDRAWAL OF
OBJECTIONS OF G4S SECURE
INTEGRATION LLC AND G4S SECURE
SOLUTIONS (USA), INC. TO PROPOSED
CURE AMOUNTS SET FORTH ON THE
SCHEDULE OF EXECUTORY CONTRACTS
AND UNEXPIRED LEASES TO BE ASSUMED
PURSUANT TO THE PLAN SET FORTH IN
THE DEBTORS' NOTICE OF FILING OF
PLAN SUPPLEMENT IN CONNECTION
WITH THE DEBTORS' AND SHAREHOLDER
PROPOSERS' JOINT CHAPTER 11 PLAN
OF REORGANIZATION DATED MARCH 16,
2020**

1 Creditors, G4S Secure Integration LLC (“Secure Integration”) and G4S Secure Solutions
2 (USA), Inc. (“Secure Solutions”, and collectively with Secure Integration “G4S”), by and through
3 counsel hereby withdraw *the Objection of G4S Secure Integration LLC and G4S Secure Solutions*
4 *(USA), Inc. to Proposed Cure Amounts Set Forth on the Schedule of Executory Contracts and*
5 *Unexpired Leases to be Assumed Pursuant to the Plan Set Forth in the Debtors’ Notice of Filing*
6 *of Plan Supplement in Connection with the Debtors’ and Shareholder Proponents’ Joint Chapter*
7 *11 Plan or Reorganization Dated March 16, 2020* (the “Objection”) [Docket No. 7253] filed on
8 May 15, 2020. Pursuant to a settlement between G4S and Debtors, G4S’s objection with response
9 to cure amounts has been resolved.

10 Dated: March 3 2021

DINSMORE & SHOHL LLP

11 By: /s/ Ashleigh A. Danker
12 Ashleigh A. Danker, Esq.
13 DINSMORE & SHOHL LLP
14 550 S. Hope Street, Ste. 1765
15 Los Angeles, California 90071
16 Telephone: (213) 335-7737
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18 *Attorneys to G4S USA, G4S Secure Solutions*
19 *(USA), Inc. and G4S Secure Integration LLC*
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1 **CERTIFICATE OF SERVICE**

2 I, Ashleigh A. Danker, do declare and state as follows:

3 1. I am employed in Los Angeles County in the State of California. I am more than
4 eighteen years old and not a party to this action. My business address is Dinsmore & Shohl LLP,
5 550 S. Hope Street, Suite 1765, Los Angeles, CA 90071.

6 2. I certify that on March 3, 2021, I caused a true and correct copy of the following
7 document to be served via e-mail on the Standard Party Email Service List attached hereto as
8 Exhibit "A:"

9 **NOTICE OF WITHDRAWAL OF OBJECTIONS OF G4S SECURE INTEGRATION**
10 **LLC AND G4S SECURE SOLUTIONS (USA), INC. TO PROPOSED CURE**
11 **AMOUNTS SET FORTH ON THE SCHEDULE OF EXECUTORY CONTRACTS**
12 **AND UNEXPIRED LEASES TO BE ASSUMED PURSUANT TO THE PLAN SET**
13 **FORTH IN THE DEBTORS' NOTICE OF FILING OF PLAN SUPPLEMENT IN**
14 **CONNECTION WITH THE DEBTORS' AND SHAREHOLDER PROPONENTS'**
15 **JOINT CHAPTER 11 PLAN OF REORGANIZATION DATED MARCH 16, 2020**

16 I declare under penalty of perjury under the laws of the United States of America, that the
17 foregoing is true and correct and that if called upon as a witness, I could and would testify thereto.

18 Dated: March 3, 2021

19 _____
20 /s/ Ashleigh A. Danker
21 Ashleigh A. Danker
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EXHIBIT A
Standard Parties Email Service List
Served via Email

DESCRIPTION	NAME	NOTICE NAME	EMAIL
Counsel to Debtors	Weil, Gotshal & Manges LLP	Attn: Stephen Karotkin, Jessica Liou, Matthew Goren	stephen.karotkin@weil.com matthew.goren@weil.com jessica.liou@weil.com
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Counsel to Debtors	Keller Benvenuti Kim LLP	Attn: Tobias Keller, Jane Kim	tkeller@kbkllp.com jkim@kbkllp.com
Office of the United States Trustee	Office of the United States Trustee	Attn: James L. Snyder, Esq. , Timothy Laffreddi, Esq., Marta E. Villacorta	James.L.Snyder@usdoj.gov timothy.s.laffreddi@usdoj.gov Marta.Villacorta@usdoj.gov
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Counsel for the agent under the Debtors' proposed debtor in possession financing facilities	Davis Polk & Wardwell LLP	Attn: Eli J. Vonnegut, David Schiff, Timothy Graulich	eli.vonnegut@davispolk.com david.schiff@davispolk.com timothy.graulich@davispolk.com

DESCRIPTION	NAME	NOTICE NAME	EMAIL
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Interested Party United States on behalf of the Federal Energy Regulatory Commission	U.S. Department of Justice	Attn: Danielle A. Pham	danielle.pham@usdoj.gov
PG&E Shareholders	Jones Day	Attn: Bruce S. Bennett, Joshua M. Mester, James O. Johnston,	bbennett@jonesday.com jmester@jonesday.com jjohnston@jonesday.com
Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Akin Gump Strauss Hauer & Feld LLP	Attn: Ashley Vinson Crawford	avcrawford@akingump.com
Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Akin Gump Strauss Hauer & Feld LLP	Attn: Michael S. Stamer, Ira S. Dizengoff, David H. Botter	mstamer@akingump.com idizengoff@akingump.com dbotter@akingump.com
Co-Counsel to the Ad Hoc Committee of Senior Unsecured Noteholders of Pacific Gas and Electric Company	Braunhagey & Borden LLP	Attn: J. Noah Hagey, Jeffrey M. Theodore, David H. Kwasniewski, Andrew Levine	hagey@braunhagey.com theodore@braunhagey.com kwasniewski@braunhagey.com levine@braunhagey.com

DESCRIPTION	NAME	NOTICE NAME	EMAIL
Counsel for Ad Hoc Group of Subrogation Claim Holders	Willkie Farr & Gallagher LLP	Attn: Matthew A. Feldman, Joseph G. Minias, Daniel I. Forman, Benjamin P. McCallen; Antonio Yanez, Jr., Erica L. Kerman, Jonathan D. Waisnor, Matthew Freimuth	mfeldman@willkie.com jminias@willkie.com dforman@willkie.com bmccallen@willkie.com ayanez@willkie.com ekerman@willkie.com jwaisnor@willkie.com mfreimuth@willkie.com
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U.S. Nuclear Regulatory Commission	U.S. Nuclear Regulatory Commission	Attn: Anita Ghosh Naber	anita.ghoshnaber@nrc.gov